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Attorneys for Defendant
LIBERTY SURPLUS INSURANCE CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

THE CRONE LAW GROUP and MARK E.
CRONE

Plaintiffs,

vs.

LIBERTY SURPLUS INSURANCE
CORPORATION

Defendants.

Case No. 3:13-cv-05395-EDL

STIPULATION AND ~~PROPOSED~~
ORDER CONTINUING MARCH 25, 2014
CASE MANAGEMENT CONFERENCE

Hon. Elizabeth D. Laporte

Case Management Conference:
March 25, 2014 at 10:00 a.m.

1 Plaintiffs, Mark E. Crone ("Mark Crone") and The Crone Law Group ("Crone Law"),
2 and Defendant Liberty Surplus Insurance Corporation ("Liberty" or "LSIC") hereby enter into
3 the stipulation set forth below.

4 WHEREAS:

5 1. The initial Case Management Conference ("CMC") in this matter currently is set
6 for March 25, 2014.

7 2. The parties are committed to pursuing Alternative Dispute Resolution, would like
8 to complete ADR prior to the initial CMC, and will make a good faith effort to resolve this
9 matter though ADR before either the parties or the Court need to prepare a case management
10 plan.

11 3. This matter has been referred to Magistrate Judge Joseph C. Spero for settlement
12 purposes. On March 5, 2015 Judge Spero entered an order (Docket No. 23) setting a Settlement
13 Conference for May 15, 2014.

14 4. Rather than going forward with a Case Management Conference on March 25,
15 2014, the parties believe that it would better serve the interests of judicial economy to continue
16 the CMC until after the May 15, 2014 Settlement Conference. The parties suggest that the Court
17 re-schedule the CMC for June 3, 2014 or a later, convenient date.

18 THEREFORE, THE PARTIES HEREBY STIPULATE, AND JOINTLY REQUEST THE
19 COURT TO ORDER THAT:

20 1. The Case Management Conference presently set for February 18, 2014 will be
21 continued to June 3, 2014, at 10:00 a.m.

22 2. The Joint Case Management Statement will be due seven days prior to the date of
23 the continued Case Management Conference.

1 Dated: March 18, 2014

CORNERSTONE LAW GROUP

2
3 By Gordon W. Renneisen /s/
Gordon W. Renneisen
Attorneys for Plaintiffs
THE CRONE LAW GROUP and
MARK E. CRONE

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6 Dated: March 18, 2014

ROPES & GRAY LLP

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8
9 By Matthew M. Burke /s/
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15
16 Attorneys for Defendant
LIBERTY SURPLUS
17 INSURANCE CORPORATION

18 IT IS SO ORDERED.

19 Dated: March 18, 2014

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HONORABLE ELIZABETH D. LAPORTE